

#### REMARKS

Applicants respectfully request favorable reconsideration of this application, as amended.

Applicants gratefully acknowledge the indication that Claims 12-15 are allowed and that Claims 5-9 and 11 contain allowable subject matter.

Without concession as to the propriety of the outstanding rejection on Estakhri under 35 U.S.C. §102(b), Claims 1, 2, 3 and 16 have been amended to recite more particular features of the invention.

Amended independent Claims 1-3 recite that a control circuit in the memory card is adapted to store into a predetermined area of the nonvolatile memory an updated version of an erase table, which includes an updated free-space information flag from a previous version of the erase table, the predetermined area being a different area than an area in which the previous version of the erase table is stored.

Amended independent Claim 16 recites that an updated version of an erase table, which includes an updated free-space information flag from a previous version of the erase table, is stored into a predetermined area of the nonvolatile memory, the predetermined area being a different

area than an area in which the previous version of the erase table is stored.

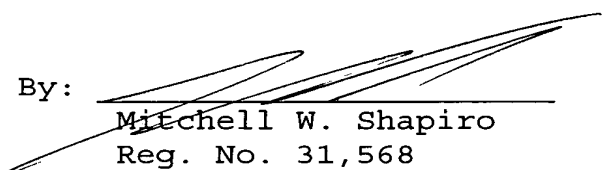
At least the above features of Claims 1-3 and 16 are neither taught nor suggested by Estakhri.

Accordingly, the rejection under §102(b) should be withdrawn, and an early Notice of Allowance is respectfully requested.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (XA-9632A) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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